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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THE STATE OF NEVADA,
DEPARTMENT OF EMPLOYMENT
TRAINING and REHABILITATION, *ex*
rel. CHAGOLLA,

Plaintiff,

vs.

LYFT, INC.,

Defendants.

Case No.: 3:23-cv-00442-LRH-CLB

**ORDER GRANTING STIPULATION
FOR PLAINTIFF TO FILE THEIR
FIRST AMENDED COMPLAINT**

Plaintiff THE STATE OF NEVADA, DEPARTMENT OF EMPLOYMENT TRAINING
and REHABILITATION, *ex rel.* CHAGOLLA (“Plaintiff”) and Defendants LYFT, INC.
 (“Defendants”) (collectively the “Parties”), by and through their undersigned counsel, hereby
agree and stipulate for Plaintiff to file a First Amended Complaint.

Accordingly, the Parties agree and stipulate as follows:

1. Plaintiff filed her Complaint for Violations of the Nevada False Claims Act on or
about February 8, 2023, in the Second Judicial District Court of the State of Nevada in and for
the County of Washoe.

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2. On or about June 9, 2023, the State of Nevada and the Nevada Attorney General (the "State") declined to intervene.

3. On or about September 6, 2023, Defendant removed this action to the United States District Court, District of Nevada.

4. On or about October 19, 2023, Defendant filed their Motion to Dismiss Relator's Qui Tam Complaint (ECF No. 14).

5. On or about October 20, 2023, the Parties filed a Stipulation and Proposed Order to extend time for Plaintiff to respond to Defendant's Motion to Dismiss (ECF NO. 15). The Stipulation was granted on September 24, 2023 (ECF NO. 16), extending Plaintiffs response deadline to November 16, 2023.

6. FRCP 15(a)(2) provides that "a party may amend its pleading only with the opposing party's written consent[.]"

7. Defendant has consented to the filing of an amended complaint.

8. Plaintiff's First Amended Complaint shall be filed no later than Thursday, November 16, 2023.

This stipulation is made in good faith and not for the purposes of undue delay or burden. No parties are prejudiced by this stipulation.

DATED: November 15, 2023

Respectfully submitted,

/s/ Joshua D. Buck

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Respectfully submitted,

/s/ Kirsten A. Milton

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Attorneys for Defendant, Lyft, Inc.

IT IS SO ORDERED.

DATED: November 16, 2023.


UNITED STATES MAGISTRATE JUDGE